

appearance or in the alternative enter a pro se appearance, and thus are unable to plead or otherwise defend this case. Plaintiffs respectfully request the Clerk or the Court to enter Defendants' default in this matter. Plaintiffs will file a separate Motion for Default Judgment after default is entered.

Dated: November 9, 2023

Respectfully Submitted,

/s/ Bradley Manewith

Bradley Manewith, IARDC # 6280535
Lichten & Liss-Riordan, P.C.
5 Revere Drive, Suite 200
Northbrook, IL 60062
Tel. (617) 994-5800
Fax (617) 994-5801
bmanewith@llrlaw.com

Harold L. Lichten (*pro hac vice*)
Mel Gonzalez (*pro hac vice*)
Olena Savytska (*pro hac vice anticipated*)
Lichten & Liss-Riordan, P.C.
729 Boylston Street, Ste. 2000
Boston, MA 02116
Tel. (617) 994-5800
Fax (617) 994-5801
hlichten@llrlaw.com
mgonzalez@llrlaw.com
osavytska@llrlaw.com

*Attorneys for Plaintiffs and the proposed
class and collective*

CERTIFICATE OF SERVICE

I, Bradley Manewith, hereby certify that a true and accurate copy of this document will be served on Defendants Pigeon Freight Services, Inc., and Sergiu Tintuic by process server, by U.S. Mail and by UPS Overnight Delivery to the following addresses:

Pigeon Freight Services, Inc.
c/o Sergiu Tintuic
16830 Chicago Ave
Lansing, IL, 60438

Sergiu Tintuic
6 Jacqueline Lane
Fox River Grove, IL, 60021

/s/ Bradley Manewith
Bradley Manewith